

COMMENTS NOT INCLUDED IN THE DRAFT HOUSING ELEMENT GOALS, POLICIES AND PROGRAMS

1. Below Market Rate (BMR)—Increase the percentage requirement from 10 percent to 15 percent or 20 percent for redevelopment projects that replace rental housing with ownership housing.

Staff Comment: Based on staff analysis, the City can meet its Regional Housing Needs Allocation (RHNA) numbers without increasing its BMR requirements. In addition, because of the state of the current housing and lending market, increasing the BMR requirements may impact the production of housing.

Recommending an increase to the BMR requirements is beyond the scope of the Housing Element. Substantial analysis would be required to study the proposal, particularly analyzing the impact increasing the percentage requirements for BMR units could have on the production of new housing.

2. Adopt and Implement Rent Control

Staff Comment: In the current housing market, implementing rent control may discourage investment in rental properties because the amount of rent that could be charged would be capped. Analyzing rent control is a significant policy decision that would require substantial study by staff which may be beyond the scope of the Housing Element.

3. Utilize Vacant Buildings as Homeless Shelters—Utilize vacant buildings as homeless shelters.

Staff Comment: This policy would be difficult to implement because not all buildings are designed for residential occupancy and because some buildings may not be located in the most appropriate location for use as a homeless shelter. Program 6 of Goal 6 of the Draft Goals, Policies and Programs will require the City to identify a zoning district for a homeless shelter.

4. Project Design Comments—The City received feedback about design for projects such as encouraging varied design for new larger housing projects, making lobbies and walkways publicly accessible, designing new projects so the front doors orient to the street, ensuring access to sun and light, requiring architectural excellence when density is increased and discouraging gated new development.

Staff Comment: These comments are project design policies that typically are not included in a Housing Element. The Housing Element is meant to provide policies and programs that encourage housing production to meet the needs of the

community. Some of these design comments may be addressed as part of the General Plan update.

5. **Mitigations for Projects**—The City received comments regarding potential mitigations for project-related traffic, traffic safety and noise.

Staff Comment: Potential impacts are studied and mitigations are required on a project-by-project basis. In addition, a General Plan typically has policies regarding how traffic and noise impacts are addressed that are not part of a Housing Element. Traffic and noise issues will be studied further with the update of the General Plan.

SP/9/CDD
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